

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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U.S. BANK, NA AS LEGAL TITLE TRUSTEE FOR  
TRUMAN 2016 SC6 TITLE TRUST,

CASE NO: CV 22-7475

Plaintiff,

- against -

**NOTICE OF MOTION FOR  
REMAND AND FOR AN  
AWARD OF ATTORNEYS'  
FEES AND COSTS**

ASHMEEN MODIKHAN; ET AL.,

Defendant(s).

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**PLEASE TAKE NOTICE** that plaintiff U.S. BANK, NA AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST (“Plaintiff” or “U.S. Bank”), by and through its undersigned counsel, FRIEDMAN VARTOLO, LLP, shall move this Court, at a date and time to be determined by the Court, before the Honorable Pamela K. Chen, United States District Judge, Courtroom 4F at the United States District Court, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an order remanding this matter to the Supreme Court of New York, Queens County, and for an award of attorneys’ fees and costs.

**PLEASE TAKE FURTHER NOTICE** that in support of its motion, Plaintiff shall reply upon: (i) the Memorandum of Law submitted herewith; and (ii) the Declaration of Zachary Gold, Esq.

Dated: January 4, 2022  
New York, New York

Respectively submitted,

**FRIEDMAN VARTOLO, LLP**

/s/ Zachary Gold

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*Attorneys for Plaintiff U.S. BANK, NA*

*AS LEGAL TITLE TRUSTEE FOR*

*TRUMAN 2016 SC6 TITLE TRUST*